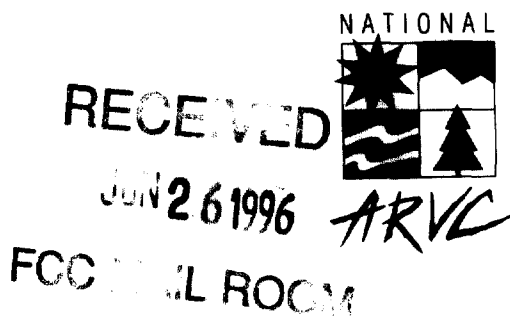


National
Association
of RV Parks &
Campgrounds



June 24, 1996

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Ref: ^{FCC} Docket No. 96-254

Dear Sirs:

The following comments on the above referenced docket refer to the Notice of Proposed Rule Making, pages 37-39, paragraphs 67-73 regarding the interLATA PIC issues.

The National Association of RV Parks and Campgrounds (ARVC) represents the commercial campground industry comprised of more than 9,000 independent small businesses. Among the primary responsibilities of the association is to assist the members' in securing and reliable products and services at competitive prices.

Pay telephones are an integral and key part of campground and RV park and their availability to the customer is an important feature of a commercial park. To assist the association members, approximately 18 months ago ARVC created a special pay phone program through AT&T. Today, over 1200 of member parks have **contracted** with AT&T for 0+ long distance service on their LEC provided public payphones. These contracts currently include over 2,000 payphones located nationwide and this number is increasing everyday. This program has been a resounding success with our members. Please let me explain the reason for this.

Customer Service!!! We are part of the Hospitality Industry. To be successful, our member parks must provide the very highest level of customer service possible or the paying public will go elsewhere. Parks have tried many other carriers on their payphones, some by choice, some not by choice (slamming). They have become educated to the fact that AOS companies charge much higher rates than AT & T and result in angry customers and even lost customers. They also report that since going with AT&T, not only have customer service telephone complaints virtually disappeared, but customers are even going out of their way to thank them for providing AT&T on their payphones.

Clearly, AT&T is the carrier of choice for the millions of Americans who either travel by RV and frequent RV parks and campgrounds or who enjoy the outdoor lifestyle embodied by camping.

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IN OUR VIEW, IF A PARK (LOCATION PROVIDER) IS NOT ABLE TO PROVIDE AT&T AS THE CARRIER FOR INTERLATA AND INTRALATA CALLS FROM THEIR LEC PAY PHONES, **IT IS ABSOLUTELY NOT IN THE PUBLIC INTEREST.**

Re: Section 276(b)(3)- "Nothing in this section shall effect any existing contracts between location providers and payphone service providers....." It appears that this rule is already being violated in various parts of the country. Every park that falls under the jurisdiction of Citizens Telecom was sent a letter dated April 9, 1996 (see attached). Citizens has decided that they will provide MCI service on all of their payphones and the location provider has no choice. The letter states to call to discuss this matter, but when parks call the discussion is that they are using MCI and that's that. This has created very unhappy location providers because they are now back to having unhappy customers. **THIS IS ABSOLUTELY NOT IN THE PUBLIC INTEREST.**

A park in Florida has three LEC payphones provided by United Telephone. United told this location provider that he had to use the LEC for long distance on the payphones or else they would remove the payphones. This location called the Florida Public Service Commission for an opinion. The PSC's opinion was that United could not interfere with an existing valid AT&T contract. So United promptly removed all three payphones, and reinstalled three new payphones with different line numbers and claimed that there was no longer a valid AT&T contract. They also gave the location provider a new option. If the location provider wanted to use AT&T, they would have to pay United \$65.00 per month per payphone. However, if they would use United for the long distance, there was no charge for the pay phones. This equates to over \$2,300 per year, so of course the location provider was forced to use United for the long distance with the net result of angering his customers and lowering the level of customer service he is able to provide. **THIS IS ABSOLUTELY NOT IN THE PUBLIC INTEREST.**

It is our opinion that LEC's and BOC's are already acting anti-competitively at the expense of location providers and the traveling public at large. **If the FCC grants the LEC's and BOC's the right to choose the InterLATA and/or intraLata carrier for their own payphones, they will most certainly choose themselves or a carrier with whom they have a favored financial arrangement.** It is quite obvious that they have the power to do so already by threatening removal of payphones or requiring location providers to pay to assure that the PAY PHONES remain in the park. (Many parks already are paying monthly fees to the LEC's and BOC's for payphones, but at least for now they can choose their carrier and provide the highest level of customer service, while recouping some of the cost through commissions.)

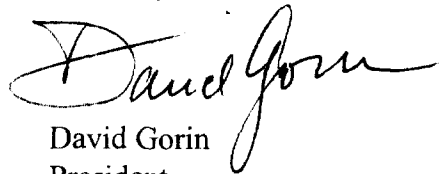
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Please do not grant the LEC's and/or BOC's the right to choose the carrier for the interLATA and intraLATA calls placed from their payphones. It would be a great injustice to the consumers using the payphones and to the location providers. We feel that our member parks provide an excellent representative example of what will happen with the entire payphone situation nationwide.

We welcome the opportunity to provide further information, evidence of the actions described above or additional comment. We would also be happy to respond to questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Gorin". The signature is fluid and cursive, with a large initial "D" and "G".

David Gorin
President

cc:
Common Carrier Bureau
Federal Communications Commission
Enforcement Division
Room 608
M Street, NW
Washington, DC 20554